

1909-012 Chancery Causes: Martha E. Anderson vs. Jesse Anderson &
Lee Co.

Sage, Collins

CA - Divorce
T - Property
Vices
Women

To the Hon H. A. W. Skeen, Judge of the Circuit Court of Lee County, Virginia.

Humbly complaining, your oratrix, Martha E. Anderson, would respectfully represent and show unto your honor, that on or about the ____ day of _____, 1883, she was inter-married with one Jessee Anderson, in this Lee County, Virginia, and from that day until the present time she has lived and co-habited with the said Jessee Anderson as his wife, and has been unto him an obedient and industrious wife; that to them were born five children, one of whom died in infancy, leaving four living children, to-wit? J. B. Anderson, who is now 24 years of age, Minerva Anderson, who is 20 years of age, L. L. Anderson, 18 years of age, and L. R. Anderson, 16 years of age. all single; that your oratrix prior to her marriage with the said Jessee Anderson was a widow, and that her former husband was named Sage; that the said Jessee Anderson at the time of his said marriage with your oratrix was likewise a widower, and had four living children, to-wit, Geo. W. Anderson, C. P. Anderson, L. M. Anderson and Laura Anderson, the last named inter married with one Comadore Collins. Your oratrix would respectfully represent and show unto the court, that she is now and has been for more than twelve months next preceeding the institution of this suit a citizen of Lee County, Virginia, and that the said Jessee Anderson is like wise a citizen of said county; that the said Jessee Anderson has for the last few years been very cruel and abuseive to your oratrix, calling her a great many vile and improper names, has repeatedly threatened to dash her brains out with a chair, to kill her, and finally this morning, to-wit May 18th, 1909, he drove your oratrix from his home, also her two youngest sons, L. L. Anderson and L. R. Anderson, swore that his said ~~children should never return to said place, and that he would not live with your oratrix any more as his wife, and that any~~

children should never return to said place and that he would not live with your oratrix any more as his wife under any circumstances, and therefore she has without any provocation on her part abandoned and deserted her.

Your oratrix would further represent and show unto your honor, that at the time of her marriage with the said Jessee Anderson she had one cow, which the said Jessee Anderson sold for \$30.00, one heifer, which he sold for \$20.00, another heifer which he sold for \$7.00, one horse which he sold for \$100.00; that she had cash on hands, which he used, \$40.00 that he put into the house and probably the cash and likely the two heifers into a tract of land in Lee County, Virginia, on Black Water Creek, which he purchased from one Oliver Brewer; that the said Anderson has never reimbursed her for the property that he used of hers, that the said Anderson now owns a farm in Lee County, Virginia, on Black Water worth at least \$6,000.00; that he has personal property worth at least five or six hundred dollars, House hold and kitchen furniture worth from two to three hundred dollars . That when the said Anderson first purchased said farm he took a deed from the said Oliver Brewer and his wife unto himself, which deed he never had recorded, since his marriage with your orator in order to defeat and deprive your oratrix of dower in the said land and farm the said Jessee Anderson on the 15th day of November, 1893, had the said Oliver Brewer to make a deed for said land unto himself and his three sons, by his first wife, to-wit, Geo. W. Anderson/ Chas. P/ Anderson, and Luther M. Anderson, a copy of which deed is here with filed marked Exhibit "A", and prayed to be read and treated as a part of this bill. That since the execution of said last named deed C. P. Anderson died intestate, and a bachelor. This said land the ^{as used and treated} said Jessee Anderson has owned as his own property and that the

said deed was made to himself and his said children aforesaid for the express purpose of defeating and depriving your oratrix of her dower in his said property should she survive him. Your oratrix would now further show unto your honor, that she has no property of her own with which to maintain a suit and no means of earning a livelihood, she now being a woman in poor health and 56 years of age, and she is advised that she is entitled to have said deed of November, 15th, 1893, a copy of which is heretofore been filed with this bill, as exhibit "A", annulled and set aside, in so far as the children of the said Anderson are concerned, and in so far as it effects her rights as the wife of the said Jesse Anderson, and that she is entitled to have her support and maintenance out of said land and the property of the said Jesse Anderson, suitable to her rank, age, and station in life, and that she is entitled to a divorce from bed and board from her said husband.

The prayer therefore, of your oratrix is that the said Jesse Anderson, G. W. Anderson, and Luther M. Anderson, be made parties defendant to this bill, that they be required to answer the same but not under oath, that being expressly waived/ that the said deed of November, 15th, 1893 from Oliver Brewer to the said Jesse Anderson, Geo. W. Anderson, C. P. Anderson/ L. M. Anderson, be vacated, annulled and set aside so far as the same effects the rights of your oratrix, as the wife of the said Jesse Anderson, that the said Jesse Anderson be required and compelled to support and maintain you oratrix ^{in a manner} suitable to her rank, age, and station and condition in life and in accordance to his means; that a decree for divorce from bed and board from the said Jesse Anderson, that ^{be granted her} he be compelled pending this suit to pay her at least \$200.00 temporary alimony, and suit money; that he be inhibited and restrained

and enjoined from disposing of and selling his lands and property until this suit is settled, and that he be compelled to produce and file among the papers of this cause the deed first made by Oliver Brewer to himself for said land ~~for recordation~~, and that the same may be ordered to be recorded . And that all such other further and general relief be afforded your oratrix as in the premises may be just and right, And she will ever pray &c.

Virginia, Lee County to-wit:

This day Martha E. Anderson personally appeared before me J. W. Orr, a commissioner in chancery for the Circuit Court of Lee County, Virginia, and made oath that the allegations set out in the foregoing bill so far as they depend upon her own knowledge are true, and so far as they depend upon the knowledge of others she believes them to be true .

Given under my hand this the 18th day of May, 1909.

Commissioner in Chancery .

Martha E Anderson
vs. { Pitt -
Jesse Anderson et al
